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Attorneys for Defendant Meta Platforms, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IN RE META PIXEL TAX FILING CASES

Case No. 5:22-cv-07557-PCP (VKD)

This Document Relates To:

All Actions

**DECLARATION OF LAUREN R.
GOLDMAN IN SUPPORT OF
DEFENDANT'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

Hon. P. Casey Pitts

I, Lauren R. Goldman, state and declare as follows:

1. I am an attorney licensed to practice in the State of New York. I am a partner at the law firm Gibson, Dunn & Crutcher LLP, counsel of record for Defendant Meta Platforms, Inc. (“Meta”) in these actions. I am admitted *pro hac vice* to practice before this Court. I am familiar with Meta’s treatment of proprietary and confidential information based on my personal experience representing Meta.¹ I have personal knowledge of the facts stated below and, if called as a witness, I could and would testify competently thereto.

2. I submit this declaration under Local Rule 79-5(f)(3) in support of Meta’s Administrative Motion to Consider Whether Another Party’s Materials Should Be Sealed.

3. Meta moves to file the documents listed below provisionally under seal at plaintiffs’ request because they contain information that plaintiffs designated confidential.

Document	Designating Party	Portion(s) to be Sealed
Notice of Motion and Motion to Exclude the Testimony of Colin Weir	Plaintiffs	Page 1, lines 7-11, 20-21, 27-28; page 2, lines 1-2; page 3, lines 8-11, 26-28; page 4, lines 2-6, 18-20.
Exhibit A	Plaintiffs	Entire Document.

4. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 27th day of October 2025 in New York, New York.

/s/ Lauren R. Goldman
Lauren R. Goldman

¹ Courts in this District routinely grant motions to seal on the basis of declarations of counsel submitted pursuant to Local Rule 79-5. *See, e.g., Avago Techs. Fiber IP (Singapore) PTE. Ltd., v. IPtronics Inc.*, No. 5:10-cv-02863-EJD, Dkt Nos. 544 (N.D. Cal. Apr. 3, 2015), 545 (N.D. Cal. Apr. 7, 2015); *Cisco Sys. Inc., v. OpenTV Inc.*, No. 5:13-cv-00282-EJD, Dkt. Nos. 76, 82 (N.D. Cal. Oct. 8, 2013). I am personally familiar with Meta’s practices of safeguarding proprietary information, including based on my experience representing Meta for many years, but if the Court deems this declaration insufficient, Meta respectfully requests that it be permitted to file a further declaration supporting filing under seal.